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June 23, 2022

**Via ECF and Email**

Hon. Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Center Street  
New York, NY 10007

Re: United States v. Samuel Martinez,  
22 Cr. 194 (S.D.N.Y.)

Dear Judge Furman:

This firm represents Samuel Martinez in the above-captioned matter. Pursuant to Paragraph 2(D) of your Honor's Individual Rules and Practices, Mr. Martinez respectfully requests a 60-day adjournment of the current motions schedule and the next pretrial conference. *See* Apr. 12, 2022 Minute Entry. The government consents to the request and we consent to an exclusion of time for Speedy Trial purposes until the next conference. This is our first such request.

We request this extension so that we have sufficient time to produce and review discovery and engage in plea negotiations. The undersigned has a three-week trial scheduled to begin July 11, 2022 in the Eastern District of New York and will require additional time in order to fully evaluate discovery and engage in plea negotiations or prepare potential motions.

Under the current schedule, motions are due by 8/5/2022, opposition are due by 8/19/2022, and replies are due by 8/26/2022. The next pretrial conference is scheduled for 8/10/2022 at 3:30 p.m., with time excluded in the interest of justice until 8/10/2022. If the Court grants the 60-day extension, the parties propose the following schedule:

- Motions due by 10/4/2022;
- Opposition due by 10/18/2022;

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- Replies due by 10/25/2022;
- Next pretrial conference on 10/10/2022, with time excluded in the interest of justice until 10/10/2022.

We have submitted a proposed order to the Court by e-mail, along with this request for adjournment.

Thank you for your consideration of this request.

Respectfully submitted,

MORVILLO ABRAMOWITZ  
GRAND IASON & ANELLO P.C.

/s/ Telemachus P. Kasulis

Telemachus P. Kasulis

*Counsel for Samuel Martinez*

cc: All counsel (via ECF)

Application GRANTED. Motions shall be filed by 10/4/2022. Opposition shall be filed by 10/18/2022. Replies, if any, shall be filed by 10/25/2022. The next pretrial conference is scheduled for 10/13/2022 at 3:15 p.m. (The Court is closed on the requested date of October 10, 2022.) Time is hereby excluded from the speedy trial clock in the interests of justice from today, June 23, 2022, until October 13, 2022, for the reasons set forth above. The Clerk of Court is directed to terminate Doc. #13. SO ORDERED.



June 24, 2022